

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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FARAH JEAN FRANCOIS,

Case No. 1:22-cv-4447

Plaintiff,

- against -

NOTICE OF MOTION

**VICTORY AUTO GROUP LLC d/b/a
VICTORY MITSUBISHI, SPARTAN
AUTO GROUP LLC d/b/a VICTORY
MITSUBISHI, STAVROS ORSARIS,
YESSICA VALLEJO, DAVID PEREZ,
DIANE ARGYROPOULOS, and
PHILIP ARGYROPOULOS**

Defendants.

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PLEASE TAKE NOTICE that VICTORY AUTO GROUP LLC d/b/a VICTORY MITSUBISHI (“Victory Auto”), SPARTAN AUTO GROUP LLC d/b/a VICTORY MITSUBISHI (“Spartan Auto”), STAVROS ORSARIS (“Orsaris”), YESSICA VALLEJO (“Vallejo”), DAVID PEREZ (“Perez”), DIANE ARGYROPOULOS (“Diane”) and PHILIP ARGYROPOULOS (“Philip”) (collectively “Defendants”), upon the accompanying Memorandum of Law in Support of Defendants’ Motion for Summary Judgment, the Affirmation of H. Nicholas Goodman dated February 24, 2023, and the exhibits annexed thereto, hereby move this Court, before the Hon. Jed S. Rakoff, at the United States Courthouse located at 500 Pearl Street, New York, New York, Courtroom 14-B, on March 30, 2023, at 9:00am for an Order, pursuant to [Federal Rule of Civil Procedure \(“FRCP”\) Rule 56](#), granting Defendants Summary Judgment and dismissing Counts I and II of Plaintiff’s First-Amended Complaint as to all Defendants or, in the alternative, granting partial Summary Judgment dismissing Count II of Plaintiff’s First-Amended Complaint in its entirety and dismissing Counts I and II thereof as against Victory Auto, Philip, and Diane and limiting scope of

the trial of Count I of Plaintiff's Amended Complaint to the scope of Plaintiff's recoverable damages, together with such other and further relief as this Court deems just and proper.

Dated: New York, New York
February 24, 2023

Yours, etc.
NICHOLAS GOODMAN & ASSOCIATES, PLLC

BY: _____
H. Nicholas Goodman
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d/b/a VICTORY MITSUBISHI,
SPARTAN AUTO GROUP LLC
d/b/a VICTORY MITSUBISHI,
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